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April 23, 2019

BY ECF

Hon. Dora L. Irizarry
United States District Court Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United Specialty Insurance Company, et al. v. W.S. Construction, Inc., et al.*,
17-cv-04641 (DLI) (SMG)

Your Honor:

This law firm represents defendants 47 Douglass LLC, Steven Vaubel, Anita Vaubel, Stefan Vaubel and Stanzi Vaubel (the “47 Douglass Defendants”) in the above-referenced matter.

This letter is respectfully submitted, with the consent of counsel for United Specialty Insurance Company and Century Surety Company (“Plaintiffs”) and W.S. Construction, Inc. (“WSC”), to request a further extension and modification of the briefing schedule for Plaintiffs’ motion for summary judgment. The parties have participated in two in-person mediation sessions and one telephonic mediation session and have made considerable progress towards settlement. The most recent mediation session was held on April 18, 2019 before the Honorable Joseph Spinola, whose efforts are ongoing.

Thus, in order to allow the parties to devote their resources to settlement, rather than the cost and expense of motion practice, it is respectfully requested that the time for WSC and the 47 Douglass Defendants to serve opposition papers be extended to May 21, 2019, and the time for Plaintiffs to serve their reply papers and e-file the fully briefed motion be extended to June 14, 2019.

Thank you for your time and consideration in this matter.

Respectfully Submitted,



Brett B. Theis

Cc: All parties (by ECF)